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Connie Chung, AICP, Supervising Regional Planner
Department of Regional Planning
320 West Temple Street, Room 1356
Los Angeles, CA 90012

**RE: Comments of Southern California Gas Company to Los Angeles County
General Plan Update 2035 Draft Environmental Impact Report**

Dear Ms. Chung,

Southern California Gas Company (SoCalGas) thanks you for giving us the opportunity to review the Draft Environmental Impact Report (DEIR) for the Los Angeles County General Plan Update (the "Project"). We applaud the County's efforts to update its general plan in a manner that considers orderly and appropriate land use designations.

SoCalGas also appreciates the County's acknowledgement of the importance of natural gas to the residents and economy of the Los Angeles Basin. In particular, we appreciate the DEIR's consideration of the potential impacts of the Project to Mineral Resources and Utility and Service Systems generally, and to SoCalGas' Playa Del Rey underground natural storage facility in the West Side Planning Area (DEIR p. 5.11-44, 5.11.45). Nonetheless, SoCalGas is concerned that the County has not properly evaluated the impacts that revising its Significant Ecological Area (SEA) boundaries would cause to SoCalGas' Aliso Canyon Natural Gas Storage Facility (Aliso Canyon), portions of which are proposed to be included within the new SEA boundaries.

Aliso Canyon is located north of Porter Ranch and is Southern California's largest natural gas storage facility (much larger than the Playa Del Rey facility). Aliso Canyon is vital to ensuring safe and reliable natural gas and electric service in Southern California (which is powered primarily by natural gas). Because of this, it is critical that SoCalGas maintain its ability to operate, repair, upgrade, and if necessary, expand operations within its property boundaries in order to properly serve our customers throughout Central and Southern California.

SoCalGas is concerned that inclusion of portions of Aliso Canyon within SEA boundaries may impact its ability to operate its facilities appropriately.

Further, SoCalGas is concerned that inclusion of Aliso Canyon within revised SEA boundaries may, at a minimum, cause significant confusion and potential permitting delays. This is possible because the County has not considered whether it has appropriate discretionary authority to enforce an SEA land use designation at Aliso Canyon, the operation of which is subject to the jurisdiction of state regulatory agencies such as DOGGR and the California Public Utilities Commission (CPUC)¹. In the past, the CPUC has clearly recognized local jurisdictions rights to appropriate time, place and manner restrictions on facilities subject to its jurisdiction. However, the CPUC may, and often does, assert its preemptory jurisdiction over local ordinances that conflict with its authority, such as those that purport to grant local jurisdictions authority to issue discretionary permits such as Conditional Use Permits to facilities subject to CPUC jurisdiction. This is a likely scenario in the event the County revises the SEA boundaries to include Aliso Canyon.²

Consequently, we urge the County to consider the potential impacts to SoCalGas' current and future operations at Aliso Canyon as a result of including portions of the facility within the revised SEA boundaries. This is particularly important given that the facility is not only of local importance, but of statewide concern as well.

If you have any questions, or would like to set up a meeting to discuss this matter further, we would be happy to oblige. Thank you very much.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Albert J. Garcia', with a long horizontal flourish extending to the right.

ALBERT J. GARCIA

¹ SoCalGas is a public utility subject to the Commission's jurisdiction, pursuant to Public Utilities Code § 216 and § 222, and the Aliso Canyon is a gas plant facility regulated by the Commission, pursuant to Public Utilities Code § 221.

² As recently as November, 2013, in Decision D.13-11-023, the CPUC asserted its preemptive jurisdiction at Aliso Canyon over potentially conflicting County ordinances in its evaluation of the Aliso Canyon Turbine Replacement Project. In the Decision, the CPUC determined that Aliso Canyon and the Turbine Replacement Project were matters of statewide concern. In particular, the CPUC confirmed its authority to "preempt local regulation of the Storage Field facilities and operations authorized by the [Certificate of Public Convenience and Necessity] to the extent such local regulations either conflict or interfere with the Commission's plenary jurisdiction to regulate public utilities, or else interfere with a regulated public utilities' ability to comply with a Commission order."